

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

TRACEY E. GEORGE, ELLEN WRIGHT)
CLAYTON, DEBORAH WEBSTER-CLAIR,)
KENNETH T. WHALUM Jr., MERYL RICE,)
JAN LIFF, TERESA M. HALLORAN, and)
MARY HOWARD HAYES,)

Plaintiffs,)

v.)

Case No. 3:14-2182

WILLIAM EDWARD "BILL" HASLAM, as)
Governor the State of Tennessee, in his)
official capacity; et al.)

Defendants.)

DEFENDANTS' MOTION TO DISMISS

Come the Defendants, Governor Bill Haslam, Secretary of State Tre Hargett, Coordinator of Elections Mark Goins, Attorney General and Reporter Herbert H. Slatery III, and State Election Commission members Judy Blackburn, Donna Barrett, Greg Duckett, Tommy Head, Jimmy Wallace, Tom Wheeler and Kent Younce, all in their official capacities, and hereby respectfully move this Court to dismiss Plaintiffs' Complaint in its entirety and with prejudice for lack of subject matter jurisdiction and failure to state a claim pursuant to Fed. R. Civ. P. 12(b)(1) and (6).

This motion is supported by an accompanying memorandum of law.

Respectfully submitted

HERBERT H. SLATERY III
Attorney General and Reporter

ANDRÉE SOPHIA BLUMSTEIN
Solicitor General

/s/ Janet M. Kleinfelter

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 11th day of December, 2014 a copy of the above document has been served upon the following persons by:

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/s/ Janet M. Kleinfelter

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